

Exhibit B



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May 1, 2023

Via Electronic Mail

Adam Ross Zurbriggen, Esquire
Jonah Santiago-Pagan, Esquire
City of Philadelphia, Law Department
Civil Rights Unit
Attorneys for the Defendants

Re: Alvarado v. City of Philadelphia, et al., 2:22-cv-03763-JFM

Dear Adam and Jonah,

I am writing here in response to your letter of April 12th.

A. Let's take the 16 depositions that you have agreed to at this time. We may require additional depositions should a manifest particular need emerge. With one exception: I believe that we definitely need to depose "Parole Officer Shannon," since he or she was a point person between the physical property and the Police Department. Are you able to produce this person and do you agree to do so? If you do not agree to produce this person, please provide his or her contact information. The term "contact information" means here: full legal name and nicknames or aliases; last known and/or current home and work address, place of employment and position, email address(es) and telephone number(s); and other information known to you that would assist in the location of the person at issue.

B. As I think you may be aware, I have had some health issues recently, and I actually had a neck surgery this morning, in addition to having a newborn at home. So, I wasn't able to get as much done on this case as I hoped in April. However, I am currently available for depositions in this case each work day from May 15 to May 24. So, if you can produce the witnesses during that time, we should be able to complete those 16 depositions by the end of May. I am also able to present Yara.

C. Given the complexity of this case, the number of important witnesses, and what remains to do, the current discovery deadline is unrealistic. Do you agree to submit a joint Rule 29 stipulation to the Court requesting an additional 90 days to complete discovery?



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D. With regards to the outstanding objections to various discovery requests, my expert tells me that we can resolve these if you agree to produce to Plaintiff the following:

1. The Internal Affairs Policy/directive on conducting investigations that was in effect on 6/4/21;
2. The Executing Search warrant policy/directive that was in effect on 6/4/21;
3. Documentation regarding whether Philadelphia Police Department was accredited through the Pennsylvania Law Enforcement Accreditation Commission (PLEAC) on the date of the incident;
4. All policies/directives provided by PLEAC;
5. The full IAB investigation including the conclusions and findings from the incident on 6/4/21 pertaining to not only the discharge of the firearm, but the execution of the search warrant at the residence;
6. SWAT policy/directive that was in effect on 6/4/21;
7. IAB policy on civil complaints against officers and/or the PPD that was in effect on 6/4/21;
8. All previous investigation/incident reports pertaining to 4664 Torresdale Avenue;
9. Any reports / documentation concerning Detective Horn contacting Licenses and Inspections to determine if the property was legally turned into a duplex as stated in D000010;
10. Any reports/documentation concerning statement provided by property owner;
11. Any correspondence received from the property owner concerning the purchase of the residence as stated in email when requested by LT Hendershot;
12. Emails/correspondence from ADA Clark Beljean clearing Officer Song for the discharge of a firearm;
13. Use of Force Review Board determinations/findings report;
14. Determination of Officer Song's five (5) previous officer involved shootings as stated in OIS Investigation Unit Report D000121;
15. Materials/Lesson plan/PowerPoint of Phase IV of the Discharge Firearms Training - Situation Awareness & Dog Encounters received by Officer Song after the incident;
16. Any reports/documentation concerning the interviews conducted with the parents who resided on the 2nd floor where the suspect was believed to have been living;
17. Discipline records for Sgt Mellody, LT Monk, Detectives Graf and Scully, Officer Song;
18. All training records of Sgt Mellody, LT Monk, Detectives Graf and Scully, Officer Song; and
19. Any documentation that states Sgt Mellody, LT Monk, Detectives Graf and Scully, Officer Song have reviewed all PPD policies.



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Are you able and willing to provide these materials? We will be required to file a discovery motion if you are unable or unwilling to provide them.

Please provide a response to the above matters by the end of this week.

Best wishes,

/s/ Keith West
Keith West